Labadie (J. Meyer notes- 4.18.16)

- MO recommended unclassifiable
  - MO "default" modeling demonstrated nonattainment, as did SC and Ameren
  - MO based unclassifiable recommendation based on historical monitoring, current monitoring (April-Sep at that point), and Ameren model run using beta options

- EPA recommended nonattainment
  - Based on MO modeling (historical and current monitoring analysis not relevant, beta options not approved)

- SC comment (18 pages)
  - Ameren beta modeling flawed- merged stacks, varied met data and background, used "actual" flow data vs. standard flows (measured halfway up the stack, rather than at exit)
  - Ameren's modeling appears to choose a result and work backwards by altering inputs
  - Even using most current version of AERMOD, results identical
  - Fixing errors in Ameren's beta options modeling shows nonattainment
  - Monitoring data does not show clear and convincing evidence that area is in attainment (monitor siting (6% of all hourly winds from Labadie hit monitors and 8 months of data)
  - Weight of evidence demonstrates nonattainment

- Ameren comment (45 pages w/ 17 attachments)
  - Modeling
    - MO wasn't using most recent version of AERMOD
    - Ameren's beta option modeling shows MDNR/Sierra Club modeling over predicts
    - Stacks should be merged b/c allowed elsewhere (R8?)
    - Background concentration should be urban, not rural
    - Beta options shouldn't be rejected
    - **2013-2015 modeling, even when using flaws indicated by EPA, demonstrates attainment**
  - Monitoring
    - EPA inconsistent (allowed unclassifiable in CO w/ less than 3 yrs. Monitoring)
    - Monitoring shows modeling unreliable
    - EPA should not have said monitoring was not QA/QCd
    - Historic monitoring data should be taken into account